

2923

JIM D. GUDMUNDSEN
PLAINTIFF
VS
HOWARD W. BRANTLEY
DEFENDANT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW

Comes now the Defendant in the above styled cause and for answer to the Complaint heretofore filed against him pleads as follows:

1.

Not guilty.

2.

The Defendant alleges that the Plaintiff was himself guilty of negligence at the time and place alleged in the complaint, which proximately contributed to his alleged injuries and damages in that he so negligently operated his motor vehicle at said time and place so as to cause or allow the same to run into, upon or against the vehicle of the Defendant, thereby proximately contributing to his own alleged injuries and damages, and hence he should not be allowed to recover in this suit.

Walters & Brantley

BY: Solbert M Brantley
attorneys for the Defendant

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Howard W. Brantley to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Jim D. Gudmundsen.

Witness my hand this 5th day of May, 1956.

Alice J. Dush
Clerk

JIM D. GUDMUNDSEN,	§	
Plaintiff,	§	IN THE CIRCUIT COURT OF
vs.	§	BALDWIN COUNTY, ALABAMA
HOWARD W. BRANTLEY,	§	AT LAW
Defendant.	§	

COUNT ONE:

The Plaintiff claims of the Defendant the sum of \$1,500.00 as damages for that on heretofore to-wit; on the 9th day of January 1956 at to-wit: 4:30 o'clock P. M. at a point 3.2 miles West of the city limits of Silverhill in Baldwin County, Alabama, on Alabama Highway Number 104, a public road in Baldwin County, Alabama, the Defendant, Howard W. Brantley, so negligently operated a motor truck at said time and place so as to cause or to allow the same to run into or collide with the automobile of the Plaintiff and as a proximate consequence and result of the negligence of the Defendant aforesaid, the Plaintiff's automobile was greatly damaged in this: the entire front end thereof was bent, broken and smashed, the radiator, hood, both front fenders, engine and front windshield were bent and broken, the doors were sprung, the front posts were bent, the frame was bent, and the said automobile otherwise greatly damaged and broken; all to the damage of the Plaintiff, wherefore he brings this suit and asks judgment in the above amount.

LYONS, PIPES & COCK

and

CHASON & STONE

By:


Attorneys for Plaintiff

Plaintiff respectfully demands a
trial of this cause by jury.

CHASON & STONE

By:


Attorneys for Plaintiff

Defendants Address:

General Delivery
Daphne, Alabama

Received 4 day of May 1956
and on 8 day of May 1956
served a copy of the within S & C
on Howard W. Brantley

By service on _____

TAYLOR WILKINS, Sheriff
By Ed Leigh Steadler D. S.

Sheriff claims 34 miles at
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
BY Steadler
DEPUTY SHERIFF

Wapline

2923

RECORDED

JIM D. GUDMUNDSEN,
Plaintiff,

vs.

HOWARD W. BRANTLEY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS and COMPLAINT

FILED
MAY 4 1956
ALICE J. DUCK, Clerk

LAW OFFICES

CHASON & STONE
BAY MINETTE, ALABAMA